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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W., Room TW-A325
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On September 18, Vantage Point Solutions (VPS) filed a response to the FCC's request for input on the process and mechanics related to the upcoming CAF II auction.¹

In that filing, VPS offered four arguments indicating that a substantial "locations gap" exists between the number of locations the CACM says exist and the actual number of locations. As part of our third argument, VPS noted that in-field geocoding had uncovered a locations gap in excess of 25% for one carrier.² VPS has continued to do analysis for this company, and it appears the locations gap for this carrier may be lower than estimated. Additional in-field geocoding is being conducted, and the final locations gap for this carrier will likely end up being less than 15%. Accordingly, VPS is updating the record with more accurate information.

The three other arguments provided by VPS remain valid and continue to support the requests for relief outlined by Vantage Point in the September 18 filing.

Respectfully submitted,



Dustin "Dusty" Johnson
Vice President of Consulting

¹ FCC 17-101 in WC Docket No. 10-90 "Comment Sought on competitive bidding procedures and certain program requirements for the Connect America Fund Phase II Auction (Auction 903)," released August 4th, 2017.

² VPS comments filed September 18, 2017, page 3, "3. Rate-of-Return Model Company Geocoding."